

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

CIVIL ACTION NO. 2:10-1087
(Lead Action)

\$88,029.08, MORE OR LESS,
IN UNITED STATES CURRENCY,

Defendant

UNITED STATES OF AMERICA,

Plaintiff,

v.

CIVIL ACTION NO. 2:11-0101
(Consolidated action)

\$27,671.50, MORE OR LESS,
IN UNITED STATES CURRENCY,

Defendant.

UNITED STATES MOTION FOR
CERTIFICATE OF REASONABLE CAUSE

Comes now the United States of America, by counsel, Betty A. Pullin, Assistant United States Attorney for the Southern District of West Virginia, and hereby moves the court for the issuance of a Certificate of Reasonable Cause, as authorized by 28 U.S.C. § 2465(a)(2), with regard to the seizure of \$27,671.50, more or less, seized from claimant Katherine A. Hoover's Wesbanco Account No. XXXXX3002 and which the court has directed its return pursuant to its Memorandum Opinions entered August 8, 2011, and September 28, 2012 (ECF 93, 158). In support of its motion, the United States attaches hereto and incorporates herein the following:


(1) the Seizure Warrant, Application for seizure warrant and Affidavit in support, filed in Case No. 2:10-mj-0002 ("Govt. Ex. A"), and (2) the United States Motion to Dismiss Complaint filed on April 8, 2011 (ECF 76). The United States also incorporates herein the legal authority set forth in a memorandum of law being filed simultaneously with this motion.

WHEREFORE, for the foregoing reasons and for those stated in the accompanying memorandum of law, the United States requests that the court issue a Certificate of Reasonable Cause with regard to the seizure of the \$27,671.50, more or less, seized from Wesbanco Savings Account No. XXXXXXXX3002.

Respectfully submitted,

UNITED STATES OF AMERICA
By Counsel

R. BOOTH GOODWIN II
United States Attorney

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